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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 KIMBERLY BEAGLE,

11 Plaintiff,

12 vs.

13 RITE AID CORPORATION, a corporation;  
14 and DOES 1-100, inclusive,

15 Defendants.

Case No.: CV08-1517-PJH

PLAINTIFF'S RULE 26(f) REPORT

16 Plaintiff, KIMBERLY BEAGLE (hereinafter, BEAGLE) through counsel of record  
17 herein, Mark S. Adams and Kimberly D. Willy of Mayall, Hurley, Knutsen, Smith & Green  
18 hereby submits her Rule 26(f) Report pursuant to the Federal Rules of Civil Procedure, Rule  
19 26(f).

20 A. Plaintiff does not request any changes to the timing, form or requirement for disclosures  
21 under Rule 26(a). The parties exchanged their Rule 26(a) Initial Disclosure on June 27, 2008.

22 B. Discovery should be completed in approximately 10 months. Plaintiff intends to depose  
23 Chris Young, Leon Comerer and Steve Shipman, as well as other witnesses to the harassment,  
24 discrimination retaliation, invasion of privacy, assault, battery, or sexual assault and battery  
25 suffered by Plaintiff. Plaintiff further intends to server written discovery, including  
26 interrogatories, request for production and request for admissions on Defendant, Rite Aid.  
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1 C. At this time, Plaintiff is unaware of any discovery that she is required or would be asked  
2 to produce that was electronically stored. Plaintiff's counsel has been advised that Defendant,  
3 RITE AID may have electronically stored information related to Plaintiff's invasion of privacy  
4 cause of action.

5 D. At this time, Plaintiff is not aware of any issues about claims of privilege or of protection  
6 of trial-preparation materials.

7 E. Plaintiff requests that the court impose a non-expert discovery cut-off date, as well as an  
8 expert discovery cut-off date, and permit the parties to exchange a supplemental designation of  
9 experts after the initial designation.

10 F. Plaintiff does not currently seek any protective orders under rule 26(c). Plaintiff seeks  
11 the discovery, motion and pretrial disclosure schedule contained in the Joint Case Management  
12 Conference Statement.

13 DATED: July 28, 2008

**MAYALL, HURLEY, KNUTSEN, SMITH & GREEN**

14  
15 By: 

MARK S. ADAMS, ESQ.  
Attorneys for Plaintiff,  
KIMBERLY BEAGLE